

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

FILED
U.S. DISTRICT COURT
DISTRICT OF MARYLAND

2018 NOV 27 PM 12:35

CLERK'S OFFICE
AT BALTIMORE

BY _____ DEPUTY

**Complaint for Employment
Discrimination**

RDB 18 CV 3633

Case No. _____

(to be filled in by the Clerk's Office)

Jury Trial: ☒ Yes ☐ No
(check one)

Vincent Cannady

Jane Doe

John Doe

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-against-

State of Missouri

Brandon Qusley

Aaron Hart

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

I. The Parties to This Complaint

A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	Vincent Cannady
Street Address	PO Box 177
City and County	Linthicum Heights
State and Zip Code	MD 21090
Telephone Number	202-253-2300
E-mail Address	vincentc@dshe.org

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Defendant No. 1

Name	State of Missouri
Job or Title (if known)	
Street Address	301 High Street
City and County	Jefferson City Cole
State and Zip Code	Missouri 65101
Telephone Number	573-751-4000
E-mail Address (if known)	

Defendant No. 2

Name	Brandon Qusley
Job or Title (if known)	Client Services Manager ITSD-DNR
Street Address	1101 Riverside Drive
City and County	Jefferson City Cole
State and Zip Code	Missouri, 65102-0176
Telephone Number	573-751-5686
E-mail Address (if known)	Brandon.Ousley@oa.mo.gov

Defendant No. 3

Name	Aaron Hart
Job or Title (if known)	Human Resources Director
Street Address	301 High Street
City and County	Jefferson City, Cole
State and Zip Code	Missouri 65101
Telephone Number	573-526-4279
E-mail Address (if known)	Aaron.Hart@oa.mo.gov

(If there are more than three defendants, attach an additional page providing the same information for each additional defendant.)

C. Place of Employment

The address at which I sought employment or was employed by the defendant(s) is:

Name	ISTD Office of Administration Remote Worker
Street Address	17472 S 2950 Road
City and County	El Dorado Springs, Vernon
State and Zip Code	Missouri 64744
Telephone Number	573-469-1322 (company mobile)

II. Basis for Jurisdiction

This action is brought for discrimination in employment pursuant to *(check all that apply)*:



Title VII of the Civil Rights Act of 1964, as codified, 42 U.S.C. §§ 2000e to 2000e-17 (race, color, gender, religion, national origin).

(Note: In order to bring suit in federal district court under Title VII, you must first obtain a Notice of Right to Sue letter from the Equal Employment Opportunity Commission.)



Age Discrimination in Employment Act of 1967, as codified, 29 U.S.C. §§ 621 to 634.

(Note: In order to bring suit in federal district court under the Age Discrimination in Employment Act, you must first file a charge with the Equal Employment Opportunity Commission.)



Americans with Disabilities Act of 1990, as codified, 42 U.S.C. §§ 12112 to 12117.

(Note: In order to bring suit in federal district court under the Americans with Disabilities Act, you must first obtain a Notice of Right to Sue letter from the Equal Employment Opportunity Commission.)



Other federal law *(specify the federal law)*:
Violations of the 4th, 5th, 6th, 14th Amendment



Relevant state law *(specify, if known)*:
MO SB43 Which limits the right to file a Discrimination Lawsuit or complaint in the State of Missouri



Relevant city or county law *(specify, if known)*:

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

A. The discriminatory conduct of which I complain in this action includes (*check all that apply*):

- ☐ Failure to hire me.
- ☒ Termination of my employment.
- ☐ Failure to promote me.
- ☒ Failure to accommodate my disability.
- ☐ Unequal terms and conditions of my employment.
- ☒ Retaliation.
- ☐ Other acts (*specify*): _____

(Note: Only those grounds raised in the charge filed with the Equal Employment Opportunity Commission can be considered by the federal district court under the federal employment discrimination statutes.)

B. It is my best recollection that the alleged discriminatory acts occurred on date(s)
05/13/2014, 09/28/14, 01/16/16, 12/17/17, 04/10/18, 05/03/18, 05/11/18, 06/30/18

C. I believe that defendant(s) (*check one*):

- ☒ is/are still committing these acts against me.
- ☐ is/are not still committing these acts against me.

D. Defendant(s) discriminated against me based on my (*check all that apply and explain*):

- ☒ race African America
- ☒ color Brown
- ☐ gender/sex _____
- ☒ religion Baptist
- ☐ national origin _____
- ☒ age. My year of birth is 1966. (*Give your year of birth only if you are asserting a claim of age discrimination.*)
- ☒ disability or perceived disability (*specify disability*)
PTSD, Anxiety, Mobility Disability

- E. The facts of my case are as follows. Attach additional pages if needed.

I filed a lawsuit against the State of Missouri on 01/15/2015 for illegally dismissing me from my PhD Program.

The State responded to that lawsuit with a job offer. After obtaining an ADA Agreement with the State in January of 2016,

after I filed charges of discrimination I was transferred to the DNR Department where I eventually terminated.

The State of Missouri has continuously taken emails and other evidence from me in preparation for a lawsuit.

05/03/18 I was terminated for violating my ADA Agreement and for getting arrested and not reporting arrest in 5 days.

That was a pretext because of the ending of the Statute of limitations on the case filed 01/15/2015.

(Note: As additional support for the facts of your claim, you may attach to this complaint a copy of your charge filed with the Equal Employment Opportunity Commission, or the charge filed with the relevant state or city human rights division.)

IV. Exhaustion of Federal Administrative Remedies

- A. It is my best recollection that I filed a charge with the Equal Employment Opportunity Commission or my Equal Employment Opportunity counselor regarding the defendant's alleged discriminatory conduct on (date)

12/17/2017 updated 05/08/2018

- B. The Equal Employment Opportunity Commission (check one):

☐ has not issued a Notice of Right to Sue letter.

☒ issued a Notice of Right to Sue letter, which I received on (date)
06/30/2018

(Note: Attach a copy of the Notice of Right to Sue letter from the Equal Employment Opportunity Commission to this complaint.)

- C. Only litigants alleging age discrimination must answer this question.

Since filing my charge of age discrimination with the Equal Employment Opportunity Commission regarding the defendant's alleged discriminatory conduct (check one):

☒ 60 days or more have elapsed.

☐ less than 60 days have elapsed.

V. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

First Dismiss the Charge of Assault in Bates County Court. Second order or Grant either return to full employment by the State or wages, insurance, and other benefits for three more years. The State order to give records of all termination

Finally either order that all Incompletes Grades for the PhD Course be turned to A's on my Transcripts and expulsion removed.

or order return the funds for the 23 credits of incomplete grades and the Incomplete grades be dropped off my transcript

The class which resulted in a D and the illegal expulsion to be graded an A as well the A at UM on Transcripts

In the opposite of any those actions the State should be ordered to pay 30 million or less for violations of Missourians with Disabilities

VI. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 11/07, 2018

Signature of Plaintiff

Printed Name of Plaintiff

Vincent Camady

(If more than one plaintiff is named in the complaint, attach an additional certification and signature page for each additional plaintiff.)

B. For Attorneys

Date of signing: _____, 20__.

Signature of Attorney _____

Printed Name of Attorney _____

Bar Number _____

Name of Law Firm _____

Address _____

Telephone Number _____

E-mail Address _____

Additional Defendants

WILLIS B. DOSS, ANGELA BENNET, DENIS MEDEIROS, DENNIS MERRILL, DIANE MUTTI-BURKE, JOHN HERRON, DOUGLAS P. MUNRO, MEL TYLER, LORRAINE BROCKMANN, HUGH C. JENKINS, MICHAEL GARVIN, JENNIFER FRIEND, STATE OF MISSOURI ADMININSTRATIVE HEARING COMMISSION, UNIVERSITY OF MISSOURI KANSAS CITY, UNIVERSITY OF MISSOURI BOARD OF CURATORS, COUNTY OF BATES

I.

B. Additional Defendant Contact Information

Defendant No. 4

Name- Willis Doss

Job or Title – Applications Manager

Street Address – 1101 Riverside Drive

City and County- Jefferson City and Cole County

State and Zip Code – Missouri and 65101

Telephone Number – 573-751-5686

E-mail Address – Willis.DOss@oa.mo.gov

Defendant No. 5

Name- Angela M. Bennett

Job or Title- Former DOE KC OCR Director- Current Lawyer

Street Address – 631 E 66th Street

City and County – Kansas City and Jackson County

State and Zip Code – Missouri and 64131

Telephone Number – 816-333-0217

E-mail Address (if known)

Defendant No. 6

Name – Denis Medieros

Job or Title – Dean of Graduate Studies

Street Address City and County- 5115 Oak Street and Jackson

State and Zip Code – Kansas City and 64110

Telephone Number – 816-235-1301

E-mail Address - medeirosd@umkc.edu

Defendant No. 7

Name – Dennis Merrill

Job or Title - Curator's Teaching Professor

Street Address City and County- 5100 Rockhill Road (208 Cockefair Hall)

State and Zip Code – Kansas City and 64110

Telephone Number - 816-235-2542

E-mail Address - MerrillD@umkc.edu

Defendant No. 8

Name- Dianne Mutti-Burke

Job or Title Associate Professor History

Street Address City and County 5100 Rockhill Rd. (203 Cockefair Hall)

State and Zip Code – Kansas City and Missouri

Telephone Number- (816) 235-2549

E-mail Address - muttiburked@umkc.edu

Defendant No. 9

Name – John Herron

Job or Title Associate Dean, College of Arts and Sciences

Street Address City and County – 5100 Rockhill Rd (222B Cockefair Hall)

State and Zip Code – Kansas City and Jackson

Telephone Number – 816-235-2546

E-mail Address - HerronJ@umkc.edu

Defendant No. 10

Name Douglas P. Munro

Job or Title – Managing Partner Coggansfield, LLC

Street Address City – 116 E 25th Street, Baltimore

State and Zip Code – Maryland and 21218

Telephone Number – 410-608-8195

E-mail Address – dpmunro9@gmail.com

Mailing Address PO Box 26164, Baltimore MD 21210

Defendant No. 11

Name- Mel Tyler

Job or Title – Vice Chancellor- Director of Student Affairs

Street Address City and County- 5115 Oak St, 336 Administrative Center

State and Zip Code- Kansas City and 64110

Telephone Number – 816-235-1141

E-mail Address - tylerm@umkc.edu

Defendant No. 12

Name - Lorraine Brockmann

Job or Title Associate Professor UMKC School of Dentistry

Street Address City and County - 650 E. 25th St.

State and Zip Code – Kansas City and Jackson

Telephone Number- 816-235-5733

E-mail Address - brockmannl@umkc.edu

Defendant No. 13

Name- Hugh C. Jenkin

Job or Title – Prosecutor Bates County

Street Address- One North Delaware

City and County- Butler and Bates

State and Zip Code- Missouri and 64730

Telephone Number- 660-679-5171

E-mail Address- batescountyprosecutor@live.com

Defendant No. 14

Name – Michael Garvin

Job or Title - Senior EEO Investigator

Street Address – 5115 Oak Street, 212 Administrative Center

City and County- Kansas City and Jackson

State and Zip Code – Missouri and 64110

Telephone Number -n 816-235-1771

E-mail Address - garvinm@umkc.edu

Defendant No. 15

Name – Jennifer Friend

Job or Title – Deputy Provost/ Asst. Dean of Education

Street Address - 300F Administrative Center | 5100 Rockhill Road

City and County- Kansas City and Jackson

State and Zip Code – Missouri and 64110

Telephone Number – (816)-235-1196

E-mail Address- FriendJI@umkc.edu

Defendant No. 16

Name – State of Missouri Administrative Hearing Commission

Job or Title –

Street Address – 131 West High Street, Third Floor USPS Office Building

City and County- Jefferson City and Cole County

State and Zip Code – Missouri and 65101

Telephone Number – 573-751-5018

E-mail Address- ahc@oa.mo.gov

Defendant No. 17

Name University of Missouri Kansas City

Street Address – 5100 Rockhill Road

City and County- Kansas City and Boone

State and Zip Code – Missouri and 65201

Telephone Number- 816-235-1000

E-mail Address-chancellor@umkc.edu

Defendant No. 18

Name University of Missouri Board of Curators

Street Address City and County- 316 University Hall and Boone County

State and Zip Code – Missouri 652111

Telephone Number- 573-882-2388

E-mail Address -boardofcurators@umsystem.edu

Defendant No. 19

Name – County of Bates (Clerks Office) -

Street Address – 1 North Delaware

City and County- Butler and Bates

State and Zip Code – Missouri and 64730

Telephone Number- 660-679-3611

E-mail Address - unknown

III. **Statement of Claim**

State of Missouri

1. The State of Missouri passed SB43 disallowing Discrimination Lawsuits in Missouri
2. Missouri was the Employer who terminated Vincent Cannady 05/03/18
3. Missouri terminated 830+ in 2018 Jane and John Does before the Plaintiff.
4. The State of Missouri refused to provide information on whether the terminated employees were either disabled or veterans

5. The State of Missouri retaliated against Vincent Cannady after he filed a lawsuit with the US District Court 1:2015cv0073.
6. The Plaintiffs cannot get relief in Missouri Courts due to Mo SB43.
7. The State of Missouri refused to order UMKC to form Disabled Student Council
8. The State of Missouri did violate Plaintiffs ADA and Civil Rights by terminating him within six months of his filing EEOC charges for harassment.

Brandon Ousley

9. Brandon Ousley signed termination order after refusing Plaintiffs request to reconsider
10. Brandon Ousley violated Plaintiffs ADA rights by saying that 6am was not acceptable daily office hours when other employees started work at 6am
11. Brandon Ousley violated Plaintiff's civil rights by not assigning regular work to Plaintiff beyond Plural Sight Classes. No working with any member of the DNR ITSD Team of 150 or more employees
12. Brandon Ousley illegally stated the Plaintiff did not inform him of arrest on 04/10/2018 which Plaintiff had no knowledge that he was under a duty to inform and he was under intense anxiety causing him a lack of concentration and short-term memory loss.

Aaron Hart

13. Has a Conflict of interest in being the Human Resources Manager , ADA Coordinator and Disciplinarian his jobs leaves him the position to deny Accommodations then fire a disabled worker for not following the ADA Accommodation.
14. Aaron Hart colluded with Bates County and Hugh C. Jenkins, Brandon Ousley, Richard Klilthermes and Willis Doss to Terminate plaintiff Vincent Cannady
15. Aaron Hart ordered Matthew Laudano to not settle with the Plaintiff to give his job back plus back pay
16. Aaron Hart retaliated for the three EEOC Charges Plaintiff filed while working for the State of Missouri

Willis Doss

17. Violated Plaintiffs ADA Rights by saying that the work day began at 8 am and that the Plaintiff did not work four hours between 8-6 five days a week
18. Willis Doss caused intentional infliction of emotional distress because he would not give the Plaintiff any work other than Plural Sight classes even after plaintiff asked for other work as an ADA Accommodation
19. Willis Doss stated that on 04/10/2018 Plaintiff did not work as a reason for termination, which was untrue Plaintiff sent emails about faulty equipment and phone service on that day
20. Willis Doss refused to send Plaintiff supplies and to let Plaintiff be involved with the ITSD DNR Team, isolating him due to remote work and never invited to one meeting by Willis Doss.

Angela Bennett

21. Former Director of Civil Rights at US Dept Education was the retaliatory Reason UMKC illegally expelled Plaintiffs
22. Plaintiff filed over 30 complaints with her office only to have his Student Financial Aid Attacked under the SAP rule
23. Bennett was forced to resign because of Plaintiffs Complaint to OIG and USDOJ, two months after getting hired by UMKC Cannady was charged with Plagiarism. While the charge is not unusual the result was highly unusual of expulsion considering Plaintiff got a D in the class no one gets expelled but this was UMKC and Bennetts retaliation for a person who blocked 16000 complaints when she was the UM Board of Curators President.
24. Bennett was the UM Board Of Curators President for all of the time she was also the US Dept. of Education Director for the Office of Civil Rights

Denis Medeiros

25. Dean of Graduate Studies recommended that I be suspended for six months and kicked out of the program having to reapply for admission or be expelled forever for Plagiarism was a Pretext for Disability Discrimination

26. Dean Medeiros violated the Plaintiffs Civil Rights because there was less than 2% of African American PhD students at UMKC and the Plaintiff was the only disabled veteran who was a PhD Student
27. Dean Medeiros violated Plaintiffs Civil Rights by illegally studying his reactions to stress, even getting involved with the "illegal" criminal case against the Plaintiff. It was the Deans Program that was ordered to give Plaintiff a Mental Evaluation by the Bates County Court. This indicates Collusion by multiple State of Missouri Agencies including Office for Administration Aaron Hart who terminated the Plaintiff using the Court information, Bates County Court, Hugh C. Jenkins (he requested the Mental exam), UMKC Department of Mental Health, State of Missouri Mental Health, Nevada Police Department, etc...

Professors in the History Department

28. Dennis Merrill the Professor who filed the Plagiarism Charge
29. Dennis Merrill did not recommend retake the class and stay in Program violation of Plaintiff's Civil Rights to fair education and an ADA violation after asking for leniency or at least giving the Plaintiff an ADA Accommodation to take the class over.
30. Dianne Mutti-Burke Plaintiff's Advisor and recommended filing Plagiarism Charges against her own graduate student
31. Dianne Mutti- Burke did not recommend retake the class and stay in Program violation of Plaintiff's Civil Rights to fair education and an ADA violation after asking for leniency or at least giving the Plaintiff an ADA Accommodation to take the class over
32. John Herron was the Department Chair who warned that Lobbying for Disabled Student Rights could result in termination from the Program
33. John Herron did not recommend retake the class and stay in Program violation of Plaintiff's Civil Rights to fair education and an ADA violation after asking for leniency or at least giving the Plaintiff an ADA Accommodation to take the class over

Douglas P. Munro

- 34. Mr. Munro Violated Cannadys ADA Rights by terminating his lease for medical reasons- Medical Marijuana, Service Dog, and PTSD naps.
- 35. Douglas Munro Did violate Cannady's Civil Rights act by targeting because of his race
- 36. Douglas P. Munro targeted Cannady because of his religious beliefs

MEL TYLER

- 37. Mel Tyler authorized the removal of Plaintiff's student email account with most of the Plaintiff's evidence against him and the UM System.
- 38. Mel Tyler authorized the disallowing of completion of seven of The Plaintiff's classes, Plaintiff had requested an accommodation for all classes which was disallowed by the UMKC ADA Coordinator Scott Laurent.
- 39. Mel Tyler authorized the Satisfactory Academic Progress attack On the disabled plaintiff disallowing him Federal Student Aid and Veterans Affairs Vocational Rehabilitation funds to pay for his PhD.
- 40. Mel Tyler runs an SAP based RICO operation which denies disabled students federal student aid and sits the money in escrow accounts gaining UMKC unearned interest in the millions.

Lorraine Brockman

40. Brockman was the Chair of the Committee that ruled to expel Cannady from UMKC and any program including Law School without his testimony when he was going through a Family emergency with dying family member.
41. Brockman violated Cannady's ADA and Civil Rights by expelling him from UMKC.

Hugh C. Jenkins

42. Jenkins violated Cannady's 4th, 5th, 6th amendment rights when
 - a. He refused to answer Cannady's Motion to Dismiss
 - b. Jenkins refused Discovery by not answering Cannady's Motion for Full Disclosure
 - c. Illegally Charged and Arrested Cannady on a Pretext for getting Cannady fired.
 - d. Jenkins has Colluded with other Defendants here to cost Cannady his job, his home, and his life with unsubstantiated charges that Jenkins will not answer
 - e. Jenkins violated Cannady's right to a fair trial when he refused to Answer Cannady's Motion for Waiver of Arraignment due to health reasons provided by a Doctors Signed letter requesting Cannady not be made to go into Court but have a video, written, or teleconference pleading of innocence or guilty.
 - f. Cannady was told by his fired attorney that Jenkins plans on putting him in jail for missing his arraignment and leave him in Jail until the trial a year or more later, a clear violation of

Cannady's rights to no illegal search and seizure of himself or his property.

- g. Cannady's former attorney told him that no one in Bates especially Jenkins cares if he is a disabled veteran and they will not follow any of his doctors' s accommodation requests even they are legal under Rule 16 under the Federal Rules of Criminal Procedure.

Michael Garvin

- 43. Garvin refused to protect Cannady's ADA Rights at UMKC.
- 44. Garvin targeted Cannady for dismissal because he was a disabled veteran.
- 45. Garvin facilitated denying Cannady his Federal Student Aid.

Jennifer Friend

- 46. Friend refused to protect Cannady's ADA Rights at UMKC.
- 47. Friend targeted Cannady for dismissal because he was a disabled veteran violating his ADA Rights.
- 48. Friend facilitated denying Cannady his Federal Student Aid.

Administrative Hearing Commission (AHC)

- 49. AHC refused to protect Cannady's ADA Rights by defying the Office of Administration (OA) and giving him his job back.
- 50. AHC allowed Cannady's dismissal to forward because he was a disabled veteran violating Cannady veteran protect status.
- 51. AHC is just an arm of OA sharing budgets and emails, this

Means SB43 allows the State of Missouri to fire an employee then refuse a lawsuit in the Courts unless an employee has filed a case with the AHC which is **NOT** an Independent adjudicating body but part of the State of Missouri war on Employee rights.

52. The AHC gets its Budget from OA which is the same State of Missouri Agency that terminates State employees.
53. AHC currently has over 850 cases but refused a FOIA or Sunshine Law Request for race, disabled, age, veterans status of the terminated employees.

Board of Curators

54. University of Missouri Board of Curators allowed UMKC and the General Counsel's Office to expel military service disabled Plaintiff from UMKC Campus on September 8th, 2014
55. University of Missouri Board of Curators allowed UMKC Chancellor Leo Morton and the Director of the General Counsel Stephen J. Owens to conspire to expel UMKC's Disabled advocate who was asking where disabled student funds were at?
56. University of Missouri Board of Curators allowed UMKC and its leaders to include the General Counsel to violate the Plaintiffs

Civil Rights by its inaction

57. University of Missouri Board of Curators aka "UM" caused the Plaintiff and his family grievous harm by it inaction resulting in the loss of 175K in Student Loan funds by expulsion
58. UM participated in the actions that allowed Disabled Veteran Plaintiff to loss his veterans Vocational and Rehabilitation Benefits
59. UM allowed the only Veteran with PTSD to get his PhD paid for by the VA VRE program to be expelled causing him to loss his education veterans benefits another grievous harm
60. Stephen J. Owens Director of the General Counsel's Office advised UMKC that they were not violating the law when expelling him from his PhD Program "for disability advocacy"
61. Stephen J. Owens advised UMKC that the accommodation documents presented by the Plaintiff were not enough to stop suspension from his PhD Program, causing him intentional infliction of emotional distress
62. Owens worked with UMKC Dean Graduate Studies **Denis Medeiros** to advise them on how a legal pretext could circumvent

the protections of the ADA for Disabled Veteran Plaintiff.

63. Owens advised Former Chancellor Leo Morton to not meet with the Plaintiff who was trying to plead his case before the suspension from His PhD Program took place.
64. Owens advised and directed MU Cashier to take Plaintiffs 2015 Taxes for Summer 2013 MU PhD Agriculture class.
65. Owens advised and directed UMKC in 2013 to disallow Plaintiff student aid to attend Summer 2013 MU PhD Agriculture class.
66. Owens advised and directed Board of Curators to expel Plaintiff for Disability Advocacy.
67. Owens Directed Paul Maguffee and Marsha Fisher to advise and Direct UMKC to expel Plaintiff for disability
68. Owens created the Pretext of Plagiarism to expel Plaintiff
69. Owens advised and directed UMKC, Chancellor, and Dean Medieros to Apply as much stress to plaintiff to result in suicide such as suicides of MU and UMKC students Sacha Menu Courey and Noah Matthew Siegel.
70. Owens directed UMKC to take Plaintiff's UMKC email address Away to remove evidence of the gross misconduct of he and other University of Missouri employees.

71. Owens directed UMKC to not allow Plaintiff to complete 7
Incomplete classes after suspended from PhD Program
72. Owens directed **UMKC** to not give plaintiff a refund for \$23,000
For seven incomplete classes, due to Plaintiffs disability being
attacked by UM discriminatory tactics and employees resulting
in intentional infliction of emotional distress.
73. Owens colluded with Former Department of Education
KC Office for Civil Rights Director Angela Bennett to close
And Dismiss over 50 discrimination complaints from Plaintiffs
Vincent Cannady and Disabled Student in Higher
Education Officers Jane and John Doe. Violations of RICO.
74. Owens directed UMKC to expel Plaintiff Vincent Cannady was
short just 5 classes from starting Comps which meant he would
have been a PhD just needing to write his dissertation on the
subject that Slavery is an Inherent Disability for African
Americans.
University of Missouri Kansas City
75. UMKC did violate Plaintiffs rights by Suspending Plaintiff from
his PhD Program in June of 2014.
76. UMKC did violate the Plaintiffs rights by Expelling Plaintiff from
UMKC on September 08, 2014.
77. UMKC authorized the disallowing to register for a non degree
Program.

78. Former Chancellor Leo Morton would not meet with Plaintiff prior to Expulsion in violation of Plaintiff's student rights.

University of Missouri Kansas City

79. Mel Tyler authorized the removal of Plaintiff's student email account with most of the Plaintiff's evidence against him and the UM System.
80. Mel Tyler authorized the disallowing of completion of seven of The Plaintiff's classes, Plaintiff had requested an accommodation for all classes which was disallowed by the UMKC ADA Coordinator Scott Laurent.
81. Mel Tyler authorized the Satisfactory Academic Progress attack On the disabled plaintiff disallowing him Federal Student Aid and Veterans Affairs Vocational Rehabilitation funds to pay for his PhD.
82. UMKC through Tyler runs an SAP based RICO operation Which denies disabled students federal student aid and sits the money in escrow accounts gaining UMKC unearned interest in the millions.

Bates County Clerks Office

83. Bates County Clerk violated Cannady's ADA rights by refusing To add to the Docket that the warrant issued 10/04/18 was Rescinded by the Court in order for Cannady to have a Mental evaluation at the Department of Veterans Affairs which is intentional infliction emotional distress every time Cannady goes out in public a violation of the ADA
84. Bates County Clerk has violated Cannady 4th, 5th, and 6th Amendment rights by intentionally putting errors on the Docket Which show Cannady having warrants for his arrest and being incarcerated costing him a job in Maryland which assumed he was in Jail applying for a job

Statement of Claim or Case

So that the State of Missouri and any of its Agencies and employees, Douglas P. Munro, Hugh C. Jenkins, and Bates Co cannot plead that Cannady did not State a Claim

**State of Missouri- Return Cannady his job back with All back pay
Or pay \$10,000,000 for the 10 years the State of Missouri has
Violated Cannady's Rights, and compensatory damages of
\$10,000,000 for intentional infliction of emotional distress
In addition to converting all Incomplete Grades from UMKC to A or
Return ALL of the financial aid paid by the VA and Cannady's Student**

loans

Douglas P. Munro to be ordered to pay Cannady \$150,000 for loss Of Revenue and violating Cannady's ADA Rights and compensatory damages of \$100000 for intentional infliction of emotional distress

Hugh C. Jenkins AND Bates County to be ordered Dismiss the Case for Out of time motion response or else to produce evidence for Cannady's inspection, to be ordered to Present said evidence Affidavit of "alleged victim" to Accepting Cannady's Motion for Waiver of Arraignment. Jenkins Ordered to pay Cannady and his family \$100000 and compensatory damages of \$100000 for intentional infliction of emotional distress.